## EXHIBIT D

**Proposed Order** 

## UNITED STATES BANKRUPTCY COURT DISTRICT OF DELAWARE

In re:

AMYRIS, INC., et al.

Debtors.<sup>1</sup>

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

## ORDER GRANTING THE AD HOC NOTEHOLDER GROUP'S MOTION FOR AN ORDER AUTHORIZING RULE 2004 EXAMINATION DUCES TECUM OF THE FORIS LENDERS

Upon consideration of the motion (the "Rule 2004 Motion") of the Ad Hoc Noteholder Group (the "Ad Hoc Group"), for entry of an order pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004-1 authorizing the examination *duces tecum* of Foris Ventures, LLC, Anesma Group, LLC, Anjo Ventures, LLC, and Muirisc, LLC (together, the "Foris Lenders"); and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and the Court having found that venue of this proceeding and this Rule 2004 Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having determined that granting the relief requested in the Rule 2004 Motion is appropriate; and it appearing that due and adequate notice of the Rule 2004 Motion has been given under the circumstances, and that no other or further notice need be given; and after due deliberation and sufficient cause appearing therefor:

<sup>&</sup>lt;sup>1</sup> A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors' proposed claims and noticing agent at https://cases.stretto.com/amyris. The location of Debtor Amyris Inc.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

## IT IS HEREBY ORDERED THAT:

- 1. The Rule 2004 Motion is **GRANTED** as set forth herein.
- 2. The document requests set forth in the subpoena attached as **Exhibit C** to the Rule 2004 Motion (the "Subpoena") are authorized pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004-1, and the Ad Hoc Group is authorized to issue the Subpoena on the Foris Lenders.
- 3. Within 14 days of the entry of this Order, the Foris Lenders shall produce to the Ad Hoc Group all documents responsive to the document requests contained in the Subpoena, subject to any revisions or limitations agreed upon by the parties.
- 4. The Ad Hoc Group is authorized to serve additional subpoenas on the Foris

  Lenders relating to the topics described in the Motion or information uncovered

  by the Ad Hoc Group during the Rule 2004 discovery authorized by this Order.
- 5. The Court shall retain jurisdiction with respect to all matters arising from or related to implementation or interpretation of this Order.